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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

ESTATE OF RUSSEL MONACO, BY AND,)
THROUGH KATHY MONACO, WRONGFUL)
DEATH REPRESENTATIVE, AND KATHY)
MONACO, INDIVIDUALLY AND ON)
BEHALF OF MINOR CHILDREN,)

Plaintiff,)

vs.)

13 CV 151S

HARLEY G. MORRELL, PA-C, JOHN)
SCHNEIDER, JR., M.D., NORTHERN ROCKIES)
NEURO-SPINE, P.C. a Wyoming Corporation)
WEST PARK HOSPITAL DISTRICT, WEST)
PARK HOSPITAL, QUORUM HEALTH)
RESOURCES, LLC, a Delaware Corporation)
AND JOHN DOES 1 THROUGH 10,)

Defendants.)

ANSWER OF QUORUM HEALTH RESOURCES, LLC

COMES NOW Defendant Quorum Health Resources, LLC, by and through its attorneys,
Lathrop & Rutledge, P.C., and hereby Answers the First Amended Complaint and Jury Demand
filed on December 16, 2013 herein as follows:

1. Defendant Quorum Health Resources, LLC is without knowledge and lacks sufficient information to admit or deny the allegations of paragraphs 1-8, and therefore denies them.

2. Defendant Quorum Health Resources, LLC admits that West Park Hospital is a licensed medical facility in Cody, Wyoming and denies all other allegations in paragraph 9.

3. Defendant Quorum Health Resources, LLC admits Quorum Health Resources, LLC is a Delaware LLC independent of West Park Hospital who employs the CEO and CFO of West Park Hospital. Defendant denies all other allegations in paragraph 10.

4. Defendant Quorum Health Resources, LLC is without knowledge and lacks sufficient information to admit or deny the allegations of paragraphs 11-96, and therefore denies them.

5. Defendant Quorum Health Resources, LLC denies the allegations in paragraphs 97-105 and all of their subparts.

GENERAL DENIAL

Quorum Health Resources, LLC hereby denies all allegations not specifically admitted herein.

DEFENSES

1. Plaintiffs' First Amended Complaint and Jury Demand fails to state a claim for which relief may be granted.

2. The fault of all persons, entities and actors, whether or not joined as parties to this lawsuit, must be evaluated and liability apportioned among all such actors proportionate to their respective fault, pursuant to WYO. STAT. ANN. § 1-1-109.

3. The events, injuries, and damages described in the First Amended Complaint and Jury Demand were unavoidable and caused by conditions or individuals over which Quorum Health Resources, LLC is not responsible.

4. To the extent that Plaintiffs' alleged injuries and damages were solely and proximately caused by the superseding, unforeseeable and intervening acts, conduct or fault of third persons, parties, firms, entities and corporations over whom Quorum Health Resources, LLC had no control or right of control, Quorum Health Resources, LLC is not legally responsible for those damages.

5. Any damages awarded to Plaintiffs must be reduced by all amounts received from collateral sources.

6. Plaintiff Kathy Monaco, individually and on behalf of minor children, is an improper party to the wrongful death action and her claims should be dismissed from this action and she should be barred from recovering any damages.

7. Quorum Health Resources, LLC reserves the right to include additional affirmative defenses as they become known to it.

WHEREFORE, Defendant Quorum Health Resources, LLC respectfully requests the Court dismiss Plaintiffs' First Amended Complaint and Jury Demand with prejudice and award costs, and grant Defendant such other and further relief as the Court deems proper.

Dated this 9th day of January, 2014.

/s/ Ericka S. Smith

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Quorum Health Resources, LLC*

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the above and foregoing was served via U.S. mail and that on the 9th day of January, 2014 the foregoing was filed with the Court using the CM/ECF system and electronic notice served to the following:

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/s/ Ericka S. Smith